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Attorneys for Plaintiff  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TS-OPTICS CORPORATION,  
  
Plaintiff,

v.

MICROSOFT CORPORATION,  
  
Defendant.

Case No. 8:24-cv-01974-DOC-DFM

**PLAINTIFF'S UNOPPOSED  
MOTION FOR ISSUANCE OF  
LETTER OF REQUEST FOR  
INTERNATIONAL JUDICIAL  
ASSISTANCE**

Hearing Date: Sept. 8, 2025  
Time: 8:30 a.m.  
Courtroom: 10a

Plaintiff TS-Optics Corporation (“Plaintiff”) respectfully requests that the Court issue the letter of request attached hereto as Exhibit 1 (“Letter of Request”). The Letter of Request solicits assistance from the authorities of Japan (“Japan”) to obtain documents and deposition testimony from Hitachi-LG Data Storage, Inc (“HLDS”).

## I. FACTUAL BACKGROUND

Plaintiff is the owner by assignment of the patents-in-suit, including U.S. Patent No. 7,266,055 (the “’055 patent”). The ’055 patent is directed at an optical pickup actuator that Microsoft is accused of, *inter alia*, using and selling. *E.g.*, Dkt. 1-2. According to Microsoft, certain aspects of the accused actuators are provided by HLDS.

Plaintiff respectfully requests that the Court issue the attached Letter of Request to the judicial authorities of Japan to allow it to seek relevant discovery about the Accused Products. *See* Exhibit 1.<sup>1</sup>

## II. ARGUMENT

The Hague Convention “procedures are available whenever they will facilitate the gathering of evidence by the means authorized in the Convention.” *Société Nationale Industrielle Aéropostiale v. U.S. Dist. Ct. for the S. Dist. of Iowa*, 482 U.S. 522, 541 (1987). Because Japan is a party to the Hague Convention, the attached Letter of Request is an appropriate means for seeking discovery from HLDS.<sup>2</sup>

As reflected in the attached Letter of Request, Plaintiff seeks, among other things, documents and testimony related to HLDS’ role in developing and selling the Accused Products. *See* Exhibit 1. This information is directly related to the issues

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<sup>1</sup> Should the Court grant Plaintiff’s Motion for Issuance of Letter of Request, Plaintiff will obtain a certified Japanese translation of Exhibit 1.

<sup>2</sup> *See* <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Japan.html> (last accessed July 29, 2025); *see also* 28 USC § 1781(b)(2) (permitting the “transmittal of a letter rogatory or request directly from a tribunal in the United States to the foreign or international tribunal, officer, or agency to whom it is addressed and its return in the same manner”)

1 in this case, including but not limited to, infringement. Accordingly, Plaintiff  
2 requests that the Court issue the attached Letter of Request to the judicial authorities  
3 of Japan to obtain documents and testimony from HLDS that may be vital to Plaintiff  
4 in this case.

5 Plaintiff has met and conferred with Microsoft, and counsel for Microsoft has  
6 confirmed it does not oppose the relief sought in this motion. Microsoft also agreed  
7 to waive the requirement in Local Rule 7-3 regarding waiting 7 days to file the  
8 motion.

9 **III. CONCLUSION**

10 Plaintiff respectfully requests that the Court issue the attached Letter of  
11 Request to the judicial authorities of Japan to obtain relevant documents and other  
12 information from HLDS.

13  
14 DATED: July 30, 2025

Respectfully submitted,

15 /s/ Benjamin T. Wang

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TS-Optics Corporation***

**CERTIFICATION OF L.R. 7-3 CONFERENCE OF COUNSEL**

I hereby certify that on July 25, 2025, counsel for Plaintiff and Defendant held a telephonic meet and confer to discuss the issues addressed above. Defendant informed Plaintiff on July 28, 2025 that it did not oppose the relief requested. Defendant also agreed to waive the requirement that Plaintiff wait 7 days before filing the motion.

/s/ Benjamin T. Wang  
Benjamin T. Wang

**CERTIFICATE OF WORD COUNT**

The undersigned hereby certifies that the foregoing document contains 5,209 words, which complies with the word limit of L.R. 11-6.1.

/s/ Benjamin T. Wang  
Benjamin T. Wang

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2025, I electronically filed the foregoing document with the Clerk of the Court for the Central District of California using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

/s/ Benjamin T. Wang  
Benjamin T. Wang